

Classification: Public (Part A)

Key Decision: Yes

Gravesham Borough Council

Report to: Cabinet

Date: 31 January 2022

Reporting officer: Melanie Norris, Director (Community Services)
Sarah Parfitt, Director (Corporate Services)

Subject: Cascades Leisure Centre

Purpose and summary of report:

To provide Members with an overview of the project that is proposed for redevelopment of Cascades Leisure Centre. To seek Member approval for the progression of the proposals outlined within this report.

Recommendations:

Members are requested to:

1. Support the proposals for Cascades Leisure Centre, as set out within this report.
2. Grant delegated authority to the Director (Communities) in consultation with the Leader, the Director (Corporate Services) (in the role of S151 officer) and the Monitoring Officer; to take all necessary practical, financial and legal actions required to deliver the leisure centre within agreed budgets, (inclusive of but not limited to entering into the relevant formal legal agreements required to engage consultant support, agree and commence the procurement process, evaluate and appoint successful contractor(s), approve the design, commence construction and certify the acceptance of completion of works).

1. Introduction and Background

- 1.1 The Council commissioned Knight, Kavanagh, & Page (KKP) to undertake a feasibility study of the Council owned leisure centres, currently located at Cascades Leisure Centre and Cygnet Leisure Centre. The key focus of the study was to refresh the Council's Indoor Leisure Strategy and to redefine its needs and options for investment in its facility portfolio.
- 1.2 The updated work needed to take account of a changed landscape from the original strategy completed in 2016. These changes include the developments of the Lower Thames Crossing, potential developments undertaken in Ebbsfleet Development Corporation and the proposed Garden City, as well as the potential impact of Covid-19 on the leisure industry. The updated study work was completed over two phases;
 - Phase One – a refresh of the 2016 Indoor Strategy and, based on the refreshed strategy findings;

- Phase Two - a feasibility study to investigate whether/how to replace one or both facilities, in a process which incorporates evaluation of capital and revenue costs, as well as a management options appraisal to assist the Council in deciding on the optimal way forward.

2. Cascades Leisure Centre – strategic case for redevelopment

2.1 The main conclusions of the feasibility study can be summarised as follows;

2.1.1 There is commitment by Gravesham Borough Council to addressing health inequalities in the Borough, and to invest in new leisure provision as a means towards delivering on this commitment. The Corporate Plan has identified that it is important in ensuring that residents are ‘safe, healthy and active.’ Section two of the plan; ‘Place’ lays out the council’s commitments towards this:

- Design a quality and affordable leisure offer –improved facilities and creative sports programmes to tackle local health inequalities
- Improve resident wellbeing – provide and preserve a suite of high quality play areas and promote opportunities for active lives
- Manage a programme of proactive healthy living interventions – work with partners to support and safeguard vulnerable residents.

2.1.2 The needs assessment shows that, as per the previous 2016 GBC indoor assessment and strategy, Cascades and Cygnet Leisure centres are ageing and have issues in respect of their building quality. Whilst being well located in respect of their accessibility to Gravesham residents, they do not provide a modern, flexible offer to the community.

2.1.3 There remains a Borough shortfall of 6-8 lanes equivalent of water space in respect of swimming provision. In addition, demand for swimming lessons has returned strongly post-Pandemic locally. Reasonably strong demand has also returned in respect of sports hall and health & fitness provision. Additionally, there is a clear gap in the market locally in respect of soft play provision.

2.1.4 Providing one, community focussed, family orientated new council facility to replace the existing Cascades leisure centre at its existing site, is recommended to address the Borough’s current facility needs, assuming that the proposals at Ebbsfleet for a landmark leisure facility are also delivered as a potential replacement for Cygnet Leisure Centre.

2.1.5 A design option has been developed which offers an attractive, cohesive facility mix giving prominence to the core family focussed activities, and dedicated space for health referral and consultation. A total capital cost of circa £33.8m has been identified, inclusive of approximately £3.5m allocation for enabling works including landscaping, creation of an outdoor ‘active environment’ area and demolition of the existing Regan’s Bar public house.

2.1.6 In terms of revenue business planning, two scenarios have been tested regarding the operation of a newly built facility at Cascades Leisure Centre:

(a) continued operation via a leisure trust, and (b) outsourced operation via an external operator. Under both scenarios, the facility is predicted to generate a surplus of over £400k by year three.

3. Options considered for redevelopment

- 3.1 For the purposes of this report, considerations for redevelopment options are at this stage concentrated around the future of Cascades Leisure Centre. Proposals for a hub leisure facility at Ebbsfleet Garden City (if delivered) will provide regional standard facilities for swimming and sports hall provision. Therefore, the future plans for the current Cygnet Leisure Centre site will need to be considered and agreed once it is known whether the Ebbsfleet landmark leisure facility is developed and if so, when it will be completed.
- 3.2 **Cascades Leisure Centre** is a large wet and dry facility which has been built over several phases, with original dry side areas being constructed in the late 60's/early 70's, a leisure pool added in 1988 and a refurbishment including an extended fitness suite being completed in 2010.
- 3.3 A condition survey of the centre was completed in June 2019 by Set Square Surveyors Ltd. This confirmed that there was a requirement for £464,000 of work over the next two years alone, described as 'critical' to the operation of the facility. The following aspects of building condition were highlighted at Cascades as being of particular concern:
- Tiling to pool walls and floors is in poor condition and can result in injury to users.
 - The flume structure is corroding and requires extensive overhaul.
 - The changing areas are ageing and in need of refurbishment. Substantial work is required which will necessitate closure for a substantial period of time.
 - The main pool plant is original and is in need of attention and therefore wholesale replacement is required.
- 3.4 As part of the feasibility study, a site visit by KKP and Space & Place Architects in June 2021 confirmed that its convoluted building layout and customer journey is the legacy of the centre's phased construction. Exterior facades of the buildings, alongside wet changing areas and reception areas, are in need of major modernisation. Health and fitness facilities, however, including dry side changing rooms, have received recent investment and are in better condition.
- 3.5 Going forward a 'do nothing' approach is unworkable, due to the need for major capital investment to replace plant and machinery within the centre over the next 5-10 years alone. This is especially true within the wet-side area, which requires major refurbishment/redecorating from a customer experience perspective, just to sustain current levels of provision, without then any real means to recoup the financial investment that would need to be made, into what in essence would remain an old and outdated facility overall.
- 3.6 In respect of whether to pursue a new-build centre as opposed to a major refurbishment and remodelling programme at Cascades, with regards to the latter previous work has been undertaken which suggested a cost of c£14m at the site. However, this did not consider any substantial remodelling of the swimming facility,

which in itself will be essential to meet the Borough’s existing and future shortfall in provision, specifically with regards to lane swimming and learner pool provision.

- 3.7 Whilst a new build will have a higher capital cost, the study outlines that this should be balanced against the significant benefits provided in terms of its attractiveness, potential for co-location of health and wellbeing spaces, and greater capacity to generate revenue via a more cohesive and modern orientation of spaces.
- 3.8 It is also important to recognise that development of a new-build facility will enable the council to further deliver its ambition for its operations to be net-zero by 2030. Within its Climate Change Strategy, the council has recognised the importance of reducing direct emissions from assets over which it has financial control. Specifically, it has identified the need to progress plans to replace the existing Cascades Leisure Centre as one of the largest energy-using operational assets of the council (15% of total council emissions in 2020-21), targeting the achievement of net-zero standards. It is intended that as well as providing a building that is more environmentally friendly this will, in turn, result in a building that is more cost efficient to run.
- 3.9 Overall, and as set out in table 1 below, it is recommended within the study that a new build provides a much better balance of benefits compared to a major refurbishment and will ultimately place the council in an optimal position from which to deliver its stated health and wellbeing outcomes.

Table 1 - Refurbishment versus new build

Refurbishment	New build
<ul style="list-style-type: none"> ✓ Retain relatively new gym facilities. ✓ Lower capital cost. ✓ Potentially shorter build timeline. × Retain convoluted building layout. × Retain inefficient pool operation. × Higher long term maintenance requirement. × Need to potentially close areas off within the facility whilst work is undertaken 	<ul style="list-style-type: none"> ✓ Deliver a cohesive, modern, efficient, environmentally friendly, wet and dry offer. ✓ Realise potential remodelling / re-siting opportunity. ✓ Provide a hub for lane and learn to swim in the Borough. ✓ Increase revenue generating capacity via commercially orientated provision (soft play, clip n climb). ✓ Opportunity for greater delivery on health & wellbeing outcomes. ✓ Create a transformational, family-based leisure offer. ✓ Continuity of provision. × Higher capital cost. × Requirement to negotiate with existing tenants.

4. Potential Cascades Site Options

- 4.1 In terms of where the new facility should be located, alternative sites for development in the Borough are extremely limited, with the existing urban area being particularly constrained and focus on available sites being placed on delivering the Borough’s housing requirements. Cascades Leisure Centre’s existing site has thus emerged as the preferred location for development of a replacement council owned facility.

4.2 As outlined in the feasibility study, having established a new build as the preferred route to delivering the Cascades facility, three possible locations have been identified where a replacement centre could be sited. These include;

- Site A - Cascades Leisure Centre existing car park
- Site B – Playing field land to the rear of Cascades Leisure Centre
- Site C – Southern Valley Golf Course (land adjacent to Cascades Leisure Centre).

4.3 Whilst each of the sites under consideration presents a degree of complexity, they each could feasibly be developed as a new build option and would allow continued operation of the existing Cascades centre through the build period, which is a prerequisite of any scheme.

4.4 Site A emerged as the highest ranked site from the appraisal. It benefits from being owned by GBC and has the potential to create good visibility and site frontage of the new leisure centre. However, this site would require the closure of the on-site Regan’s Bar and associated tenancy to enable development to take place. It should be noted that this location will not affect any other tenants currently on this site.

5. Design brief & concept

5.1 Based on the findings of the needs assessment and strategic options appraisal (and on the assumption that the facility at Ebbsfleet will be delivered), it is proposed that developing a single community health/well-being and family focussed leisure centre is the most appropriate course of action for the council’s future leisure provision. Therefore, at this stage, the proposed design brief includes the following;

Activity area/room	Design brief
Lobby / foyer	The three areas combined should comprise the facility entrance and exit and be located before the controlled entry point. The key focus is to provide a welcoming entrance as well as elongating the length of stay in the facility and promoting secondary spend.
Café Seating Area / Kitchen	
Soft play area, Clip and Climb (within café)	
Reception / café servery	Ideally both of these serving points should be combined to maximise staff cross over and efficiencies.
M&F WCs (general)	General WCs and accessible WCs for café and general areas
Community rooms x2	Provision of community rooms capable of hosting primary care sessions such as weight management, health screening, dietary advice.
Pool viewing/spectator seating (100 seats)	Spectator area is predominantly for the main pool to facilitate small galas
8-lane swimming pool	Located after the entry control point to ensure security of the area and changing facilities.
Teaching pool (10 x 20m)	
Splash pad	
Wet change village / accessible change	
Viewing to small pool/splash pad	Located at poolside level and specifically facilitates viewing of swimming lessons
Studio 1 – activity	Ideally health and fitness activity areas should be clustered together

Activity area/room	Design brief
Studio 2 – holistic	to facilitate ease of access from bespoke changing rooms to fitness suite and group fitness studios. Given the prominence in the business plan the health and fitness areas should be front and centre within the facility.
Studio 3 - spin	
Fitness suite 150 stations	
Fitness change	
Squash Courts x 2	Standard squash court provision
Sports hall	Sports hall and dry-side changing areas to be close to facilitate use.
Dry change (sports hall)	
Outdoor active environment	Consideration of how external spaces (for cycling, walking, running, children’s play) can be created and/or remediated to enable connectivity to built facilities.

5.2 Leading on from the design brief and site options, the initial basic design concepts are set out below for reference. The site plan identifies the location of the new leisure centre on the site of the existing Cascades car park, lying adjacent to the boundary of the Southern Valley Golf Course and occupying a position with good visibility to Thong Lane. With the aim of increasing the quality of the open space, and creating an active outdoor environment, an informal running track has been represented on land previously occupied by the existing leisure centre. A 271-space car park is at the rear of the site, where the existing leisure centre is placed.

5.3 Initial proposed internal layouts for the facility have also been produced as part of the feasibility study report. The design outline for the ground floor is based around a central atrium area which incorporates key family focussed revenue generating areas (café, soft play, clip and climb). Core swimming and sports hall activity spaces can be accessed directly from the central core, as can the two community rooms to the front of the building which is where health referral and consultation will take place. In respect of the proposed first floor, the health and fitness gym, group cycling studio and two group exercise studios are located alongside two squash courts.

6. Indicative Capital Cost Estimate and Project Funding

6.1 S&P Architects have engaged with Faithful+Gould cost consultants to develop the capital cost plan for the preferred option, which at this stage has been based on a BREEAM standard of ‘very good’ with regards to the new facility’s environmental, social and economic sustainability performance. A high-level cost consultant’s study is included within the feasibility study report and sets out the capital cost. This has considered the design solution as per the suggested brief, and also an option to deal with the large amount of residual available land at Cascades, via external landscaping and incorporation of outdoor activity spaces. It is worth noting that the level of energy efficient design will be built in as the project progresses.

6.2 At the time of this report being published, an initial capital cost estimate of circa £33.8m has been identified. This is inclusive of an allowance of £3.5 million for external works to the site which would include external landscaping, car parking including coach drop off area and creation of an Active Environmental area. The sum does include a 10% contingency amount, but does not take into account general inflationary pressures nationally, particularly within the construction industry.

- 6.3 The Council has a number of options in regards to funding the capital cost of the project. It is proposed to finance the new leisure centre from a combination of the leisure centre earmarked reserve, attributable S106 contributions, capital receipts, revenue reserves and/or external grant contributions (where these are able to be secured), with the remaining balance funded through external borrowing funded from the forecast improved revenue income from the site. Should the improved revenue income from the site not be sufficient to meet the full cost of borrowing, the Council will need to consider other options for how these costs may be met in the longer term.
- 6.4 In considering external borrowing the Council will look to consider the most appropriate borrowing sources including the Public Works Loans Board (PWLB). It is considered that an application for funding from PWLB is likely to be successful on the basis of the application falling within its Service Delivery criteria remit. The borrowing plan also complies with the Council's own treasury/capital plan.
- 6.5 Preliminary costs associated with consultancy and external groundwork amounting to circa £300k will be funded from the Council's existing 2021-22 unapplied grants, as opposed to external borrowing.

7. Indicative Revenue Business Plan

- 7.1 KKP have produced an indicative revenue business plan for the new leisure centre which is based on a range of key assumptions about programme hours, pricing and occupancy rates in order to identify the income generation potential of the new facility. This draws upon KKP's understanding of the local area through past and current work and a range of live operational examples of where and how other modern leisure centres effectively generate income from their key activity areas.
- 7.2 Expenditure assumptions are based upon a combination of staff costs associated with the operation of each activity area alongside other costs that would reasonably be expected to see incurred for a facility mix of this type. Income and costs are based at current levels, but these may need to be projected forward if a revised approach to pricing is implemented at the opening of the centre. The indicative revenue business plan also assumes that performance of the centre will have returned to pre-COVID levels when it becomes operational.
- 7.3 The revenue business plan has been prepared on the basis of two potential operating models for consideration based on information provided by KKP; a) a trust management option or (b) management by an external (commercial) operator.
- 7.4 The council's Finance Team have analysed and reviewed the indicative Revenue Business Plan and appraised the two operating models for consideration based on information provided by KKP. The indicative revenue projections indicate that both operating options would generate a surplus position during the first five years of operation.

8. Delivery Programme and Procurement

- 8.1 A high-level, indicative delivery programme has also been developed under section 13 of the feasibility study, reflecting the Council's intention to take a Cabinet decision in January 2022 to proceed with the project. The indicative, at-pace programme

assumes completion of the facility by late Spring 2024 at the earliest and also assumes that a degree of detailed design work is in effect undertaken at risk whilst planning approval is being sought. This would allow an immediate transition from enabling works through to commencement of the main leisure centre build. Although if these timescales are to be met then it would possibly require contract re-negotiations with GCLL, who currently have a leisure contract up to March 2025.

8.2 The successful delivery of a project of this scale and complexity will be challenging, and the Council does not have all of the requisite skills, expertise or capacity required in-house. For this reason the Council will need to appoint and work with a number of experts and professional advisors to develop the work of the consultants that have already been engaged to bring forward the proposals set out in this report. It is intended that this Consultancy Team will take the project through the design and construction phases to completion.

8.3 The options available to the Council for structuring this consultancy support are considered to be:

- **Directly appointing for each area of expertise required**
 - Council will have complete control over appointment of Consultancy Team members
 - Tender process will be more time-consuming due to the need to prepare multiple tender documents, evaluate tenders received, draft and enter into legal agreements for each service procured
 - Council will have no single point of contact for the Consultancy Team and will need robust resource in place to manage each consultant
 - Risk that individual consultants will not work as effectively or efficiently as a team
- **Making a single appointment of a Lead Consultant**
 - Time Efficient Option
 - One single point of contact between the Consultancy Team and the Council
 - Increased likelihood of a cohesive team and quick resolution of issues due to the Lead Consultant having contractual control over performance of the team as a whole
 - Robust project monitoring required by the Council as the Lead Consultant and cost consultant, for example, will not be completely independent from the rest of the Consultancy Team
- **Identifying a preferred contractor and appointing consultancy support through the contractor**
 - One single point of contact for the Council and the Contractor/Consultancy Team
 - Increased likelihood of efficient working between the Consultancy Team and the contractor
 - Council may have little control over the appointments to the Consultancy Team and how the Team engages with the contractor

- Increased risk of the Council feeling removed from the design process and contractual challenges should there be a change or dispute with the contractor or a consultant.
- 8.4 It is recommended that the procurement is approached in a two-stage manner, with the procurement of consultancy services being separate from that of selecting a construction partner. Reasons for selecting a two stage approach include that the client can feel removed from the design process, and unable to fully influence the design team. The Contractor may well add a mark up to the design fees in order to protect profit margins later on in the project, and lastly it can be difficult to separate contractually if changes are required to the contractor or the design team at a later stage.
- 8.5 It is therefore proposed that the Council considers making a single appointment of a Lead Consultant, and that this be procured through a Framework Contract. It is considered that there are two preferable options for this route; use of the SCAPE Consultancy Framework or the Pagabo Framework.
- 8.6 SCAPE is a public-private sector partnership originally established by Nottinghamshire County Council. The SCAPE Consultancy Framework is a further competition or direct award framework designed to accelerate essential projects and deliver them to the highest possible standard. It is understood that over 1,000 public bodies have accessed the Framework. Consultancy service providers on the Framework will have passed a fully compliant tender process that includes rigorous requirements to meet the needs of Public Sector Clients.
- 8.7 Pagabo is a private limited company providing public sector clients with procurement solutions. The Pagabo Professional Services Framework is a further competition or direct award framework designed to procure the right consultants and professional services for construction or development projects. It is understood that 197 public bodies have accessed the Framework. As with the SCAPE Consultancy Framework, service providers on the Pagabo Professional Services Framework will have passed a fully compliant tender process to be included on the Framework.
- 8.8 Initial discussions have been undertaken with representatives from each organisation to obtain information on the respective Frameworks so that the best option for the Council can be pursued. Members are requested to delegate authority to the Director (Communities), in consultation with the Leader, the Director (Corporate Services) (in the role of S151 officer) and the Deputy Monitoring Officer teams to take all necessary practical, financial and legal actions required, including entering into the relevant formal legal agreements required to engage consultant support and commence the procurement process.
- 8.9 The indicative costs for consultant support is indicated to be 12% of the total estimated build cost. This covers the design, architect and leisure consultant fees. Survey fees are excluded as it is unknown the extent of those required at this early stage. However, discussions with Space & Place Consultancy has indicated that similar projects will require approximately £170k for survey works. Lastly, depending on the route taken with regards to a future operator of the site, there may be a requirement for additional support with regards to an operator tendering process.

9. Legal and Constitutional Considerations

- 9.1 The provision of leisure facilities by the council is a discretionary function and thus the choice on what level of facilities, if any, are provided by the Council is a matter of unfettered discretion.
- 9.2 If the Council chooses to replace its existing facility and commission a new facility, then it will need to comply with its duty to secure best value and comply with national legislation relating to public sector procurement on the processes to seek and award contracts as the value of the works and possibly services commissioned will be above relevant thresholds. At this stage, the project is in its infancy and the detail needs to be worked up and thus greater clarity on the nature of the contracts required, their likely cost and thus the processes to be followed cannot be more particularised.
- 9.3 The approval and commissioning of building works is an executive function for which the Cabinet have responsibility once the budget has been approved by the Council. The recommendations above, if agreed, give delegated authority to the named individuals to carry out all necessary steps to deliver a completed leisure centre within approved budgets without further consideration by the cabinet. Such a delegation is within the gift of the Cabinet, however, Cabinet must be content that, if granted, the level of member input into the project from hereon will be limited and thus they are satisfied there will be an adequate level of checks and balances, and accountability.
- 9.4 The Council's current leisure provision is managed by a third party contractor. The contract has limited scope to reduce the specification without continued exposure to financial commitments. It is proposed that the current leisure provision should continue to be provided whilst the new facility is commissioned. To avoid increased expenditure on managing the old and the new facility at Cascades. Following its construction, it is recommended that the closure of the old facility and opening facility are choreographed to minimise any overlap and negate the requirement for exploring contractual variations which are extremely limited.

10. Next steps

- 10.1 In order to deliver on the next stage elements outlined in this report and the accompanying feasibility study, the Council will be required to undertake procurement of a range of services in respect of consultancy (design, planning, leisure) and construction. As set out earlier in this report, it is recommended that this is approached in a two- stage manner, with the procurement of consultancy services being separate from that of selecting a construction partner.
- 10.2 Options regarding leisure centre development in Gravesham going forward, will also need to take account of the Lower Thames Crossing (LTC) programme, which may have a degree of overlap with leisure centre construction.

11. Background Papers

- 11.1 Background papers pertaining to this report are held by the Director (Communities). Anyone wishing to inspect background papers should, in the first place, be directed to Committee & Electoral Services who will make the necessary arrangements.

IMPLICATIONS	APPENDIX 1
Legal	See section nine above. The Head of Legal is part of the internal working group, who are meeting on a regular basis.
Finance and Value for Money	The financial considerations for the council are set out in Section Six and Section Seven of the main body of the report.
Risk Assessment	Replacement of a leisure centre is a large project for a district council, so it is important that the necessary resources are dedicated to this project to ensure that all risks are covered.
Data Protection Impact Assessment	<i>A data protection impact assessment (DPIA) should be carried out at the start of any major project involving the use of personal data or if you are making a significant change to an existing process.</i>
	<p>a. Does the project/change being recommended through this paper involve the processing of personal data or special category data or criminal offence data? A definition of each type of data can be found on the Information Commissioner’s Office website via the above links.</p>
	<p>b. If yes to question a, have you completed and attached a DPIA including Data Protection Officer advice? Not applicable</p>
	<p>c. If no to question b, please seek advice from your nominated DPIA assessor or the Information Governance Team at gdpr@medway.gov.uk. As above.</p>
Equality Impact Assessment	<p>a. Does the decision being made or recommended through this paper have potential to cause adverse impact or discriminate against different groups in the community? If yes, please explain answer. No</p>
	<p>b. Does the decision being made or recommended through this paper make a positive contribution to promoting equality? If yes, please explain answer. The centre proposed will be a brand new, accessible facility that will take into account all relevant modern build standards.</p>
	<i>In submitting this report, the Chief Officer doing so is confirming that they have given due regard to the equality impacts of the decision being considered, as noted in the table above</i>
Corporate Plan	<p>The Corporate Plan has identified that it is important in ensuring that residents are ‘safe, healthy and active.’ Section two of the plan; ‘Place’ lays out the council’s commitments towards this:</p> <p>Design a quality and affordable leisure offer –improved facilities and creative sports programmes to tackle local health inequalities</p> <p>Improve resident wellbeing – provide and preserve a suite of high quality play areas and promote opportunities for active lives</p>

	Manage a programme of proactive healthy living interventions – work with partners to support and safeguard vulnerable residents.
Climate Change	<p>A decision to undertake this project will have a direct impact on the delivery of the council’s Climate Change Strategy. This will contribute to Priority 1: GBC – the organisation and, specifically, the progression of plans to replace the largest energy-using operational assets of the council.</p> <p>In 2020-21 the council produced carbon emissions totalling 1,760.3 tCO₂e. Of this, 255.4 tCO₂e (15%) could be attributed to Cascades Leisure Centre.</p>
Crime and Disorder	The new centre will enable the site as a whole to be looked at in terms of access/egress from the site, especially with regards to ASB, as well as layouts of the new centre itself to mitigate historic issues associated with the existing facility.
Digital and website implications	The current leisure centre is operated by a partner organisation, so at this stage this is not an issue.
Safeguarding children and vulnerable adults	All contractors used will need to adhere to the Councils Safeguarding policy.